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**BY ECF & E-MAIL**

Nicole Argentieri  
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Assistant United States Attorneys  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

***Re: United States v. Guerra, et al., S-4 10 Cr. 147 (SLT)***

Dear Government Counsel:

We ask that the following persons, who are in the government's control and/or Bureau of Prisons custody, be produced to testify as defense witnesses at trial. We ask that they be brought to this district as expeditiously as possible in order that we may have the opportunity to meet with them prior to the defense case:

Maritza Medina  
Ronald Moran  
John Paladino  
John Pappa  
Alphonse Persico  
Carmine Sessa

With respect to John Pappa and Alphonse Persico, defense counsel has discussed the matter with both of them, and we understand that both are willing to be produced and testify as defense witnesses. With respect to the other four witnesses requested, we have no information for them other than the government's representation that these witnesses do not wish to be interviewed by the defense. We reiterate our request to speak with these witnesses as soon as possible. Additionally, we renew our request for the government's last known contact information as to John Pate and Salvatore Miciotta.

Very truly yours,

/s/

Sarita Kedia  
Paul Shechtman